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*Additional parties and counsel listed on signature page*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

**THIS DOCUMENT RELATES TO:**

*People of the State of California, et al. v. Meta Platforms, Inc., et al.*

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

# META AND COLORADO'S STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE TO COMPLETE STATE AGENCY DOCUMENT PRODUCTION

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-2 and 7-12, the Plaintiff State of Colorado (“Colorado”) and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta,” and together with Colorado, the “Parties”), through their undersigned counsel, hereby stipulate as follows:

1. Pursuant to this Court’s orders, the Parties discussed the collection of records from the following Colorado state agencies: Colorado Department of Human Services (CDHS), Colorado Department of Higher Education (CDHE), the Colorado Behavioral Health Administration (BHA), the Colorado Governor’s Office, the Colorado Office of State Planning and Budget (OSPB) and the Colorado Department of Education (CDE) (the “State Agencies”).

2. On January 15 and 16, 2025, the Parties reached search parameter agreements as to the State Agencies, including certain agreements about the number of documents a Meta search query could yield. As part of those agreements, at the request of the State of Colorado and the State Agencies, Meta agreed to issue subpoenas under Fed. R. Civ. P. 45, seeking documents responsive to document requests previously served on Colorado on February 27 and May 3, 2024, to be served on each of the State Agencies (the “Colorado Agency Subpoenas”).

3. On February 13, 2025, the Court entered an order setting certain deadlines that applied to State and agency discovery, including an April 4, 2025 deadline “to complete production of all State AG and agency documents.” *See* ECF 1696.

4. On April 4, 2025, and following Meta’s service of the Colorado Agency Subpoenas, the State Agencies and Colorado informed Meta that all of the State Agencies would require additional time to complete their document productions<sup>1</sup> and delivery of privilege logs, and requested an extension of the deadline to complete production and deliver privilege logs. Meta, Colorado, and the State Agencies subsequently agreed to extend the deadline for Colorado to complete production of state agency documents, including delivering privilege logs, to June 6, 2025. The Parties acknowledge an ongoing duty to supplement responses as necessary.

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<sup>1</sup> CDE and CDHE also produced records on April 4, 2025.

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5. Therefore, the Parties agree, subject to the Court's approval, that the deadline to complete production of all Colorado agency documents, including the delivery of privilege logs, shall be June 6, 2025 (45 days from April 22<sup>nd</sup> production date).

6. The deadlines set forth in this stipulation will not automatically affect other deadlines in the case schedule, but they may or may not require future requests by the Parties and future action by the District Court on other deadlines in the case schedule. Meta, Colorado, and the State Agencies reserve all rights with respect to other changes to deadlines, and further reserve all rights and objections previously stated in issued subpoenas and responses thereto.

10 **IT IS SO STIPULATED AND AGREED.**

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Respectfully submitted,

DATED: May 28, 2025

By: /s/ Ashley M. Simonsen

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12 *Attorneys for Plaintiff State of Colorado, ex rel. Philip*  
13 *J. Weiser, Attorney General*

1 **SIGNATURE CERTIFICATION**

2 Under Civ. L.R. 5-1(h)(3), I, Ashley M. Simonsen, hereby attest that all signatories listed, and on  
3 whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

4 DATED: May 28, 2025

/s/ *Ashley M. Simonsen*

5 Ashley M. Simonsen

6 *Counsel for Meta Platforms, Inc.; Instagram, LLC;*  
7 *Meta Payments, Inc.; and Meta Platforms*  
8 *Technologies, LLC*

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1 PURSUANT TO STIPULATION, IT IS SO ORDERED.  
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DATED:

PETER H. KANG  
UNITED STATES MAGISTRATE JUDGE